

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DAMIEN EMERSON,	)	
	)	
Plaintiff,	)	
	)	Civil Action File NO.
vs.	)	[Removed from The State Court of
	)	Fulton County; Civil Action File No.
WAL-MART STORES EAST,	)	23EV000412]
LP, CASEY DOE I, CASEY DOE	)	
II, AND CASEY DOE III,	)	
	)	
Defendants.	)	
	)	
	)	

**CORPORATE DISCLOSURE STATEMENT AND**  
**DISCLOSURE OF INTERESTED PERSONS**

Defendants, by and through counsel, and pursuant to Fed. R. Civ. P. 7.1 and  
Local Rule 3.3 hereby disclose the following:

**(1) A Complete List of Parties and Corporate Disclosure Statement**

**Required by FRCP 7.1:**

Defendant Wal-Mart Stores East, LP is a Delaware limited partnership, of  
which WSE Management, LLC is the sole general partner and WSE Investment,  
LLC is the sole limited partner. Both WSE Management, LLC and WSE  
Investment, LLC are Delaware limited liability companies with principal places of  
business in Arkansas. The sole member of both WSE Management, LLC and  
WSE Investment, LLC is Wal-Mart Stores East, LLC. Wal-Mart Stores East, LLC

is an Arkansas limited liability company with its principal place of business in Arkansas. The sole member of Wal-Mart Stores East, LLC is Walmart Inc. Walmart Inc. is a Delaware corporation with its principal place of business in Bentonville, Arkansas. Neither Wal-Mart Stores East, LP nor any of its partners were citizens of the State of Georgia at the time of, or immediately prior to, the filing and service of this lawsuit, or at any time thereafter. Walmart, Inc. was not a citizen of the State of Georgia at the time of, or immediately prior to, the filing and service of this lawsuit, or at any time thereafter.

**(2) A complete list of other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:**

Robert C. Edwards of the The Law Office of Morse and Edwards, LLC  
National Union Fire Insurance Company of Pittsburgh, PA.

**(3) A complete list of each person serving in this proceeding:**

Robert C. Edwards of The Law Office of Morse and Edwards, LLC  
Jonathan M. Adelman and Benjamin H. Harbin of the law firm Waldon  
Adelman Castilla Hiestand & Prout, LLP.

**[SIGNATURES ON FOLLOWING PAGE]**

This 21<sup>st</sup> day of February, 2023.

WALDON ADELMAN CASTILLA  
HIESTAND & PROUT

/s/ Benjamin Harbin  
Jonathan M. Adelman  
(State Bar No. 005128)  
Benjamin Harbin  
(State Bar No. 568864)  
*Attorneys for Defendants*

900 Circle 75 Parkway  
Suite 1040  
Atlanta, Georgia 30339  
(770) 953-1710  
[jadelman@wachp.com](mailto:jadelman@wachp.com)  
[bharbin@wachp.com](mailto:bharbin@wachp.com)

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing pleading is typed in 14-Point, Times New Roman font and is otherwise formatted in compliance with LR 5.1.

This 21<sup>st</sup> day of February, 2023.

WALDON ADELMAN CASTILLA  
HIESTAND & PROUT

/s/ Benjamin Harbin

Jonathan M. Adelman  
(State Bar No. 005128)

Benjamin Harbin  
(State Bar No. 568864)

*Attorneys for Defendants*

900 Circle 75 Parkway  
Suite 1040  
Atlanta, Georgia 30339  
(770) 953-1710  
[jadelman@wachp.com](mailto:jadelman@wachp.com)  
[bharbin@wachp.com](mailto:bharbin@wachp.com)

**CERTIFICATE OF SERVICE**

I hereby certify that, on this the 21<sup>st</sup> day of February, 2023, I electronically filed the foregoing *Corporate Disclosure Statement and Disclosure of Interested Persons* with the Clerk of this Court using the CM/ECF system which will automatically provide notice of such filing via electronic mail to the following attorney(s) of record:

Robert C. Edwards, Esq.  
Morse and Edwards, LLC  
191 Cleveland Avenue, SW  
Atlanta, GA 30315  
[redwards@moreseandedwardslaw.com](mailto:redwards@moreseandedwardslaw.com)  
*Attorneys for Plaintiff*

This 21<sup>st</sup> day of February, 2023.

WALDON ADELMAN CASTILLA  
HIESTAND & PROUT

/s/ Benjamin Harbin \_\_\_\_\_  
Jonathan M. Adelman  
(State Bar No. 005128)  
Benjamin Harbin  
(State Bar No. 568864)  
*Attorneys for Defendants*

900 Circle 75 Parkway  
Suite 1040  
Atlanta, Georgia 30339  
(770) 953-1710  
[jadelman@wachp.com](mailto:jadelman@wachp.com)  
[bharbin@wachp.com](mailto:bharbin@wachp.com)